

Response to Comments USEPA Region 4 Draft Proposed Plan and Public Notice Site 2 (Operable Unit 3), Waterfront Sediments NAS Pensacola, Florida Dated April 5, 2005

Comment 1:

The documents contain all components required of a formal Proposed Plan and Public Notice. However, in the review of the figures and data shown historically, it appears there is an inconsistency with the location of sampling decision units (DU).

In the Final RI Report Addendum Errata of March 2004, sampling conducted in 2000 were shown to have DUs 9-11 to be directly adjacent to the other DUs in the sampling grid. According to the Focused Feasibility Study these blocs were suddenly plotted away from the main area of the grid.

Furthermore, it is understood from text in both of these documents that the purpose of these DUs (9-11) was to delineate nature and extent of contamination to the south, east, and west. According to results, DU11 and DU08 are the areas of concern, but there is no clear evidence that the areas within these DUs are adequately delineated to the east.

Finally since Hurricane Ivan made landfall just west of the facility, it is expected that churning of the bay waters rendered the 2000 data irrelevant, as was the 1996 data after hurricane activity. Therefore the decision of "No Action" may still be the best course of action.

Response:

Agreed. The figure has been corrected to be consistent with the RI Addendum. The Navy agrees that "No Action" is the best course of action for the site.

Delineation to the east of Site 2 was limited by the Navy pier and the underwater sea wall that was identified during sampling. The sediment on the bay side of the wall was considerably coarser than that identified in the Site 2 area. Contaminants are more likely to sorb to the silts and clays on the interior of the wall.

Secondly, sampling conducted during the Pensacola Bay, Site 42 (Operable Unit 17), remedial investigation assessed sediment around the Naval Air Station including the area outside the Site 2 boundary. Operable Unit 17 was approved for no action by USEPA and FDEP. Therefore, the Navy believes that Site 2 is adequately delineated.